



STATE OF MAINE

Department of Environmental Protection

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GOVERNOR

DEAN C. MARRIOTT
COMMISSIONER

November 6, 1991

Mr. James Shafer
Department of the Navy, Northern Division
Naval Facilities Engineering Command
Building 77-L
Philadelphia Naval Shipyard
Philadelphia, PA 19112-5094

Re: Naval Air Station Brunswick, Draft Proposed Plan-Sites 1
and 3, October, 1991, by E.C. Jordan Co.

Dear Mr. Shafer:

The Maine Department of Environmental Protection (MEDEP) has reviewed the Draft Proposed Plan-Sites 1 and 3, which was submitted to the MEDEP by E.C. Jordan Co. on October 21, 1991 on behalf of the U.S. Department of the Navy for the Naval Air Station Brunswick (NASB) Site.

The MEDEP wishes to submit the following comments to be considered and addressed prior to the issuance of the Proposed Plan for this site.

General Comments:

The soil contamination concentration expressed in mg/kg or water contamination expressed in ug/l may not be understood by members of the general public. Since the main purpose of this document is to inform the public of the preferred alternative and to solicit public response, the MEDEP believes it would be useful to also express these concentrations in parts per million (ppm) or parts per billion (ppb). This will allow the general public to better interpret these concentrations and place them in proper perspective.

Specific Comments:

Page Section

Comments

5-2, section 5.0, Proposed Cleanup Objectives and Levels:
The target clean-up level of 2 ppb for vinyl chloride is not sufficiently protective as previously identified by the

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MEDEP. As discussed on October 12, 1991 the MEDEP can concur with a remedy which includes:

- 1.) a risk evaluation for the site to be conducted following completion of the remedial action
- 2.) additional remedial action for Sites 1 and 3, if the total excess cancer risk exceeds 10^{-4}
- 3.) institutional controls that must remain in place as part of the remedial alternative, if the calculated total excess cancer risk for the site exceeds 10^{-5} .

These conditions are part of the clean-up proposal and should be clearly identified in the Proposed Plan.

Section 5 must include a basic explanation of MCLs and MEGs as well as the rationale for utilizing MCLs for clean-up levels.

5-4, table 5-1: Table 5-1 should be similar to table 3-1 in the Draft Proposed Plan-Eastern Plum. Table 5-1 should summarize the maximum concentration, target cleanup level, MCL and MEG of each ground water contaminant under consideration.

6-7, section 6, Preferred Alternative: It should be made clear that the groundwater extraction system to be installed will be maintained following drawdown of the water table in order to counteract any seepage that may occur under or through the slurry wall.

If additional groundwater extraction is necessary as a result of seepage, explain how this water will be treated and identify the method of disposal to be utilized.

If possible, provide an estimation of the amount of solid material that may be generated by the groundwater treatment program which will need to be disposed of at an off-base disposal or landfill facility.

Specify that with this alternative, 16 million gallons of water are expected to need treatment.

6-12, section 6, Preferred Alternative: Although it was stated that the monitoring program will be submitted for regulatory review, the MEDEP expects the public will be concerned about future monitoring. Any additional information or description of the monitoring program would be helpful.

8-6, section 8.4, Reduction of Toxicity, Mobility, or Volume through Treatment: Although this preferred alternative is expected to reduce the toxicity, mobility, and volume of

contaminated groundwater, a statement should be included in this paragraph that indicates that source materials will remain in place but are expected to be isolated and will no longer be expected to impact groundwater.

8-9, section 8-8, State Acceptance: Although the State supports this alternative because it includes restrictions on future land and groundwater use, it has been indicated in earlier correspondence that the State will not give final approval to a remedy until it has had the opportunity to evaluate changes to a plan which are requested by other Parties (including the public). This concept should be included in section 8.8.

Glossary: Include a definition for the Maximum Exposure Guideline. This definition should read: "The maximum permissible level of a contaminant in water that is consumed as drinking water. These levels are determined by the State of Maine and applicable to all public water supplies in Maine. The MEG typically coincides with the federal MCL for each regulated contaminant however, risk based calculations have resulted in some specific MEG's that are set at a more stringent level than the MCL."

If you have any concerns or questions regarding these comments, please contact me at (207) 289-2651.

Sincerely,

Ted Wolfe

Ted Wolfe
Division of Site Investigation and Remediation
Bureau of Hazardous Materials and Solid Waste Control

cc: Michael Barden, MEDEP
Sam Butcher, Harpswell Representative
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